Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street, 10th Floor New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

Tamara Giwa
Executive Director

Jennifer L. Brown Attorney-in-Charge

July 29, 2025

VIA CM/ECF

The Honorable George B. Daniels United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

RE: United States v. Randy Burrowes

25 Cr. 009 (GBD)

Dear Judge Daniels,

SO ORDERED. The conference is adjourned to October 14, 2025 at 10:00 AM.

George B. Daniels

Dated: JUL 3 0 2025

I write to respectfully request that the Court adjourn the August 5, 2025, status conference in the above-captioned case by 60 days. The Government consents to this application.

The parties remain engaged in negotiations over a pre-trial resolution. Specifically, the defense has retained a forensic psychologist to evaluate Mr. Burrowes and prepare a report for the defense to incorporate into a broader mitigation submission. The psychologist has met with Mr. Burrowes twice and requires one or two more meetings to administer additional testing relevant to his diagnosis and recommendations, which will be the focus of the defense's mitigation letter. Accordingly, the requested adjournment is necessary to allow the psychologist to finish his work and to afford Mr. Burrowes effective representation.

The parties further agree that the exclusion of this additional period of delay from Speedy Trial Act calculations under 18 U.S.C. § 3161(h)(7)(A) is warranted because the time is necessary to facilitate productive pre-trial negotiations.

I thank the Court for its consideration of this consent application.

Respectfully Submitted,

Andrew John Dalack, Esq. Assistant Federal Defender Federal Defenders of New York

 $(646)\ 315-1527$

Cc: AUSA Amanda C. Weingarten AUSA Georgia V. Kostopoulos